

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

United States of America

v.

Willie KING

Case No. 2:23-mj-19

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of 1-11-2023 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:*Code Section*

21 U.S.C. §§ 841(a)(1), (b)(1)(C)

*Offense Description*Possession with intent to distribute a mixture or substance containing a
detectable amount of methamphetamine

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.
Complainant's signature

DEA Special Agent Christopher Cadogan

Printed name and title

Sworn to before me and signed in my presence.

Date: January 12, 2023City and state: Columbus, Ohio
Kimberly A. Johnson
United States Magistrate Judge

AFFIDAVIT

I, Christopher Cadogan, having been duly sworn, state the following:

INTRODUCTION

1. I am a Special Agent with the Drug Enforcement Administration (DEA), and have been so employed for approximately twenty-six years. I am currently assigned to Group 4 of the DEA's Columbus, Ohio District Office. This group is currently comprised of narcotics investigators from the DEA and the Columbus Division of Police (CPD). Group 4 was designed, in part, to target individuals and groups involved in the manufacture and distribution of methamphetamine, cocaine, heroin, and fentanyl in Franklin County, Ohio. Prior to being employed by the DEA, I was employed for approximately two and one-half years as a United States Border Patrol Agent. As a Border Patrol Agent, I was cross-designated to make federal arrests of individuals in violation of Title 21 of the United States Code. For more than twenty-eight years, I have had the authority to make federal drug arrests.

2. As a DEA Special Agent, Your Affiant has participated in hundreds of narcotics investigations involving various types of controlled substances. I have received substantive advanced training pertaining to the investigation of various crimes which arise from narcotics trafficking, including money laundering, the use of interstate transportation in the furtherance of narcotics trafficking, the use of the United States Postal Service facilities in furtherance of narcotics trafficking, and the use of telecommunications facilities in the furtherance of narcotics trafficking. I have participated in investigations involving the purchase of controlled substances from suspected narcotics traffickers using both undercover narcotics investigators and confidential sources. I have participated in the drafting and execution of search warrants for narcotics, proceeds from the sale of narcotics, documentary evidence of narcotics trafficking, and

for the telecommunications devices used by narcotics traffickers. I have conducted surveillance in connection with narcotics investigations. I have authored five affidavits supporting federal wire and electronic intercepts of known and suspected narcotics traffickers.

3. Through the course of these investigations, I have personally interviewed confidential sources and other persons involved in the distribution of illegal narcotics. I have also interviewed persons arrested for the distribution of illegal narcotics. I have spoken with more experienced narcotics investigators with whom I have worked concerning the practices of narcotics traffickers and the best investigative methods to use when conducting investigations of narcotics trafficking organizations. Through the course of my investigations and through my conversations with more experienced narcotics investigators, I have become familiar with the methods and means utilized by persons who participate in the illegal distribution of controlled substances.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses knowledgeable of the facts and circumstances involved in this investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaints and arrest warrants, and does not set forth all of my knowledge about this matter.

PURPOSE OF AFFIDAVIT

5. This affidavit is made in support of an application for a federal arrest warrant and criminal complaint against Willie KING for possession with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).

SUMMARY OF PROBABLE CAUSE

6. On January 11, 2023, at approximately 12:50 p.m., DEA special agents and task force officers, assisted by troopers from the Ohio State Highway Patrol (OSP), were conducting a federal search warrant at 1934 Grande Rue Circle, Columbus, Ohio 43229. This location was a known trap house where illicit drugs were distributed.

7. At approximately 1:40 p.m., investigators at 1934 Grande Rue Circle observed a black Audi Q7, bearing Ohio license plate HKD4168, drive toward 1934 Grande Rue Circle and then immediately turn around and depart the area after the driver observed marked police units who were providing security for the search team. DEA special agents and task force officers had previously observed this vehicle at 1934 Grande Rue Circle and suspected that the driver was running drugs for Eric Dewayne TURNER Sr., the main target of this federal investigation. After seeing the Audi quickly leave the area, investigators requested assistance from OSP.

8. At approximately 1:46 p.m., OSP Trooper Wilson initiated a traffic stop of the Audi on Interstate 71 South, in the area of mile marker 117, for violations of Ohio Revised Code §§ 4511.33 (marked lanes violation) and 4513.241 (excessively dark window tint). As Trooper Wilson leaned into the open front passenger window of the Audi, he could smell marijuana. In addition, the driver, who was subsequently identified as Willie KING, turned away from Trooper Wilson and appeared to be trying to retrieve something from his right rear pants pocket. Concerned that KING might have been reaching for a weapon, Trooper Wilson conducted a *Terry* frisk of KING's person and discovered a Ruger LCP, .380 caliber, semi-automatic pistol in KING's right rear pants pocket. The magazine was loaded with six live rounds, with no round in

the chamber. The pistol's serial number had been filed off. Possession of a firearm with an obliterated serial number is an offense under both federal and state law.

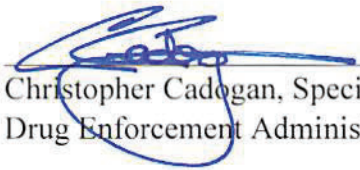
9. Trooper Wilson and Sergeant Williamson detained KING and then conducted a probable cause search of the passenger compartment of the Audi. Trooper Wilson discovered approximately 941.7 gross grams of a white crystalline substance, believed to be methamphetamine, which was contained in two zip-lock baggies and further contained within two Styrofoam food containers on the right floorboard of the vehicle.

10. After conferring with Your Affiant, Trooper Wilson and Sergeant Williamson arrested KING and transported him to the DEA's Columbus District Office for processing.

11. The suspected methamphetamine that was discovered inside the Audi was also transported to the DEA's Columbus District Office for processing. A presumptive field test of a sample that was taken from the suspected methamphetamine was positive for the presence of methamphetamine.

CONCLUSION

12. Based upon the information presented in this affidavit, there is probable cause to believe that on or about January 11, 2023, in the Southern District of Ohio, Willie KING did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C).


Christopher Cadogan, Special Agent
Drug Enforcement Administration

SUBSCRIBED and SWORN to before me this 12th day of January, 2023.


Kimberly A. Johnson
United States Magistrate Judge

